

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MYUNG BIN CHUNG,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,¹

Defendants.

Case No. 2:25-cv-00202-JHC

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER

Noted for Consideration:
April 2, 2025

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until June 3, 2025. Plaintiff brings this litigation pursuant to the Mandamus Act seeking to compel the U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate her Form I-485, Application to Register Permanent Residence or Adjust Status. Defendants’ response to the complaint is currently due on April 4, 2025. For good cause, the parties request that the Court hold this case in abeyance until June 3, 2025.

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Senior Official Performing the Duties of the Director Kika Scott for Jennifer B. Higgins, Jonathan Weeks for Anne Arries Corsano, U.S. Attorney General Pamela Bondi for James R. McHenry III, and Acting U.S. Attorney Teal Luthy Miller for Tessa M. Gorman.

1 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706
2 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to
3 control the disposition of the causes on its docket with economy of time and effort for itself, for
4 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.
5 P. 1.

6 With additional time, this case may be resolved without the need of further judicial
7 intervention. USCIS issued Plaintiff a Notice of Intent to Deny (“NOID”) the application.
8 Plaintiff has until April 28, 2025, to respond to the NOID. USCIS must receive and review this
9 response before continuing with the processing of the application. As additional time is
10 necessary for this to occur, the parties respectfully request that the instant action be stayed until
11 June 3, 2025. The parties will submit a joint status report on or before June 3, 2025.

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1 DATED this 2nd day of April, 2025.

2 Respectfully submitted,

3 TEAL LUTHY MILLER
4 Acting United States Attorney

5 s/ Michelle R. Lambert
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15 *Attorneys for Defendants*


16 *I certify that this memorandum contains 259*
17 *words, in compliance with the Local Civil*
18 *Rules.*

19 s/ Myung Bin Chung
20 MYUNG BIN CHUNG
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Pro Se Plaintiff

ORDER

The case is held in abeyance until June 3, 2025. The parties shall submit a joint status report on or before June 3, 2025. It is so **ORDERED**.

DATED this 2nd day of April, 2025.



JOHN H. CHUN
United States District Judge